

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ANDREW MUSILA,	:	Civil Action No. 4-12-752
Plaintiff	:	
	:	
v.	:	Judge Jones
	:	
LOCK HAVEN UNIVERSITY,	:	
ASSOCIATION OF	:	
PENNSYLVANIA STATE	:	
COLLEGE AND UNIVERSITY	:	
FACULTIES, DEANA HILL,	:	
ALBERT JONES, DEBORAH	:	
ERICKSON, BARBARA DIXON,	:	
LINDA KOCH, and SARAH	:	
KRAFT	:	
Defendants	:	

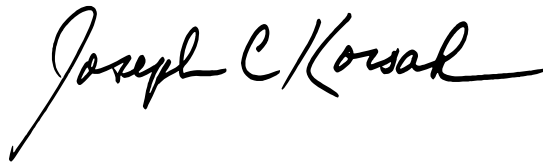
**PLAINTIFF'S ANSWER TO UNION DEFENDANTS'
MOTION TO STAY DISCOVERY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted with clarification. The Moving Defendants have filed two Rule 12(b) motions. (See Doc. 23) On or about July 18, after consultation with counsel for all defendants, it was agreed that depositions would be held on September 20, 21, 27, and 28.

5. Admitted. The Moving Defendants have already answered a Request for Production of Documents, providing some 500 pages of hastily thrown together documents without any discernable order.
6. Plaintiff believes that the Moving Defendants' "belief" is insufficient to further interfere with the scheduling in this case.
7. The allegation of costly discovery, given that this Defendant has already answered a Request for Production, is disingenuous at best. The Defendant has failed to inform the Court that the outstanding interrogatories are two questions in length. There is little left before the depositions are held.
8. Defendants have no basis for an award of counsel fees.
9. Admitted.
10. Admitted; however, Attorney Neary has agreed that her clients will provide all outstanding discovery by the 13th of August.

WHEREFORE, Plaintiff prays the Motion be denied.

Respectfully Submitted,

A handwritten signature in black ink that reads "Joseph C. Korsak". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Date: 8/12/2012

By: _____

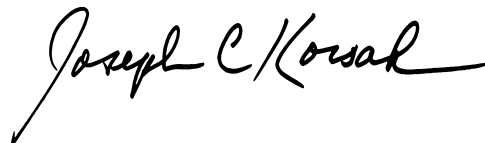
Joseph C. Korsak, Esquire
33 North Queen Street
York, PA 17403
(717) 854-3175
I.D. No. 22233

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date a true and correct copy of the foregoing document, was served by e-mail upon the following:

Keli M. Neary, Esq.
Office of the AG
15th FLOOR, STRAWBERRY SQUARE
HARRISBURG, PA. 17120

Cathleen Rebar, Esq,
Nelson, Levine, de Luca & Hamilton
518 East Township Line Road
Suite 300
Blue Bell, PA 19422

A handwritten signature in black ink, reading "Joseph C. Korsak". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Date: 8/12/2012

By: _____
Joseph C. Korsak, Esquire
33 North Queen Street
York, PA 17403
(717) 854-3175
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